


BROADBAND EXPANSION GRANT APPLICATION

For Fiscal Year 2022

Public Service Commission of Wisconsin
RECEIVED: 03/17/2022 3:34:58 PM

<p>Primary Applicant (Name and Address):</p> <p>Amherst Telephone Company 120 Mill Street, PO Box 279 Amherst, WI 54406</p>	<p>Applications MUST be UPLOADED to ERF via the Commission's website, http://psc.wi.gov/apps35/ERF_upload/content/mymenu.aspx. Refer to section 2.3 for detailed instructions.</p> <p>Applications are due and MUST be uploaded to ERF no later than: March 17, 2022 at 4:00pm (16:00) Central Time. Late applications will not be accepted.</p>	
<p>Contact for further information: PSCStatebroadbandoffice@wisconsin.gov</p>	<p>Date: December 1, 2021</p>	
<p>The Public Service Commission of Wisconsin is seeking applications for Broadband Expansion Grants. The Commission may award one or more grants during Fiscal Year 2022 to public and private entities that meet the eligibility requirements set forth in Wis. Stat. § 196.504. This grant round will be funded with bond proceeds authorized by the Wisconsin Building Commission pursuant to Wis. Stat. § 13.48(30). As such, successful applicants are subject to the requirements of Wis. Stat. § 13.48(30). Successful applicants will demonstrate a clear and achievable plan to improve broadband communications services in one or more underserved areas in the State.</p>		
<p>Applicant Certification: In signing this application, the undersigned verifies under penalty of perjury that the Applicant and its employees and agents have not, either directly or indirectly, entered into any agreement or participated in any collusion or otherwise taken any action in restraint of free competition with respect to this application; that no attempt has been made to induce any other person or firm to submit or not to submit an application; that this application has been independently arrived at without collusion with any other proposer, competitor or potential competitor; that this application has not been knowingly disclosed prior to the opening of applications to any other applicant or competitor; that all of the responses and representations of Applicant in this application are true and correct to the best of the undersigned's knowledge, information, and belief; and that Applicant agrees to, accepts, and will comply with all of the terms and conditions respecting this application and any award of a broadband expansion grant as may be established in a grant award Agreement.</p>		
<p>Name of Authorized Representative (Type or Print)</p> <p>Richard Letto</p>	<p>Title</p> <p>EVP/General Manager</p>	<p>Phone ()</p> <p>(715) 824-5529</p>
<p>Signature of Authorized Representative</p> 	<p>Date</p> <p>March 17, 2022</p>	

SUMMARY OF FY2022 GRANT APPLICATION

Primary Applicant Name Amherst Telephone Company	Amount of Broadband Grant Request (round to nearest dollar) \$339,438 (35.0%)
Federal Employer Identification No. 39-0129230	Amount of Matching Funds Pledged (round to nearest dollar) \$630,384 (65.0%)
Contact Name and Title Richard Letto, EVP/General Manager	Total Cost of Proposed Project (round to nearest dollar) \$969,822
Telephone Number (715) 824-5529	Project Name Towns of Rose and Springwater Phase I Fiber
E-mail Address(es) rletto@tvalleycom.com	Type of Proposed Broadband Service (FTTH, Cable, DSL, etc.) Fiber to the Home and Business
Grant Manager, if different than Primary Applicant	Grant Manager Federal Employer Identification No.
Grant Manager Contact Name	Grant Manager Email Address and Telephone Number
If the application proposes a public-private partnership, list the names, addresses, and FEINs of the partner companies or organizations Town of Rose, Duane Apps, Chairperson, 545 Front St., Wild Rose, WI 54984, FEIN 39-1263306 Town of Springwater, Everett Eckstein, Chairperson, W 7033 Cty GH, Wild Rose, WI 54984, FEIN 39-1054070	
Brief Project Description Fiber-to-the-Home (FTTH) broadband to an underserved area of 220 households and businesses in the Towns of Belmont, Dayton, Rose, and Springwater.	
Maximum Proposed Download Transmission Speed FTTH: 1 Gbps and faster	Maximum Proposed Upload Transmission Speed FTTH: 1 Gbps and faster
Minimum Proposed Download Speed Available To Purchase FTTH: 50 Mbps	Minimum Proposed Upload Transmission Speed Available To Purchase FTTH: 5 Mbps
County or Counties served by this project Waushara, Waupaca and Portage Counties	Community or Communities served by this project Towns of Rose and Springwater
List of the broadband service providers, if any, currently serving the area the applicant proposes to serve Centurylink, Bug Tussel, Waupaca On-Line	
Does proposed project serve an <u>unserved</u> area of the State, as defined in <u>Section 1.4</u> of the application instruction? (yes/no) No	Is the Applicant certified as a Broadband Forward! Community or Telecommuter Forward! Community, or does the grant project propose to serve a Broadband Forward! Community or Telecommuter Forward! Community? (yes/no) BB Forward!: No Telecommuter Forward!: No

For last mile projects or component the expected number of Business Locations that will have access to the improved broadband service (i.e., total business locations passed or with new service access). 12	For last mile projects or components the expected number of Residential Locations that will have access to the improved broadband service (i.e., total residential locations passed or with new service access). 208
Of the improved business locations, how many locations are <i>unserved</i> ? 0	Of the improved residential locations, how many are <i>unserved</i> ? 0
For providers that are eligible telecommunications carriers will the proposed broadband service be available to Lifeline customers? (yes/no) Lifeline-only ETC Designation is under consideration for 2022	Are there any programs available for low-income households to access low-cost service or discounts? (yes/no) Yes: Internet School Discount Program beginning March, 2021. ACP in 2022.
Is the internet service provider currently participating in the Emergency Broadband Benefit Program? (yes/no) ACP in 2022.	Is the internet service provider currently participating in the Department of Public Instruction and CESA purchasing's Digital Learning Bridge? (yes/no) No
Did the internet service provider participate in the Public Service Commission's voluntary Broadband Coverage Data Collection in 2012? (yes/no) Yes	

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Exhibit separately submitted, concurrently with this application

Exhibit C – Supplement: Contribution Agreement and Full Letters in Support of this Application

Summary of Project Budget and Funding Statement – Cost Categories
FY22 Broadband Expansion Grant Application
Budget & Income Summary


Please complete this form using Microsoft Excel. A PDF copy must be attached to your application as page four. In addition, this form must also be uploaded to ERF in Excel format.

Grant Summary

Grant Applicant:	Project:
Amherst Telephone Company	Towns of Rose and Springwater Ph 1 Fiber

Budget

Line:	Description / Category:	Grant Funds:	Match:	Total:
1	Contractual, Consultant Fees	\$ 339,438.00	\$ 630,384.00	\$ 969,822.00
2	Equipment			\$ -
3	Supplies			\$ -
4	Labor (Salary, Fringe)			\$ -
5	Permitting, Licensing Fees			\$ -
6	Travel			\$ -
7	Other			\$ -
Total:		\$ 339,438.00	\$ 630,384.00	\$ 969,822.00
65.0% match requested				

Pledged Contributions

#:	Entity:	Entity Type:	Pledge Type:	Pledge:
1	Amherst Telephone Company	Applicant	Cash	\$ 358,834.00
2	Adams Columbia Electric Cooperative	Partner	Cash	\$ 271,550.00
Total:				\$ 630,384.00

Executive Summary of this Application

This Fiber Optic project encompasses the Towns of Rose and Springwater. These rural Central Wisconsin Townships are struggling with the lack of consistent, reliable, High-Speed Broadband. We have conducted a survey and follow-up with residents and businesses in both Townships and heard the concerns about the unavailability of reliable High-Speed Broadband.

This project will expand the reach of our FY2020 PSC Grant Phase I Fiber Project and FY 2022 ARPA Grant Phase II Fiber Project in the Town of Dayton. The Towns of Rose and Springwater also asked for our help. Local anchor business in great need for improved High-Speed broadband is Adams-Columbia Electric Cooperative (ACEC). They have become a key financial partner in this project. They tell us “this effort supports our deployment of our New Advanced Metering Infrastructure (AMI) and our Smart Grid development activities which include our Substation Supervisory Control and Data Acquisition (SCADA) and Distribution Automation (DA) equipment.”

ACEC has two electric substations within the Town of Springwater that directly benefit from this project. As the local rural electric Cooperative, members living within the proposed grant areas in the Towns of Rose and Springwater benefit from their efforts to help expand broadband services to members in the area. The Towns of Rose and Springwater, along Adams-Columbia Electric Cooperative and Amherst Telephone Company, are cooperatively working together to bring residents and businesses the state-of-the-art Fiber Optic Internet service that will provide them with the consistently reliable Broadband service for work/school from home and quality business services to be competitive in the workplace and school along with improved Smart Grid activities.

The project includes constructing 18.5 miles of Fiber Optic Cable down the State Highway 22 corridor south to Wild Rose. Residents and businesses along this route will also have access to high quality reliable 1 Gigabit fiber network. This will provide future proof broadband throughout the proposed grant area.

Amherst Telephone Company, in a public-private partnership with the Town of Rose (Waushara County) and the Town of Springwater (Waushara County), in partnership with Adams-Columbia Electric Cooperative seeks a FY2022 Broadband Expansion grant in the amount of \$339,438 to provide Fiber-to-the-Home (FTTH) broadband to provide reliable Fiber Internet to the 220 households and businesses in the Towns of Rose, Springwater, Belmont and Dayton. The total cost of construction for this project is estimated at \$969,822, to which the applicants will provide a matching contribution of \$630,384, a 65% funding match.

The overall enthusiasm and commitment by residents, businesses, State, County, and Local officials for our Fiber Broadband expansion is tremendous. These townships are focused and engaged in helping to assure that they are brought forward into the 21st Century with world class Broadband services.

Amherst Telephone Company plans to offer affordable residential broadband services at our current bundled rates:

- | | |
|-----------------------------------|--------------------|
| ▪ 50 Mbps Down / 5 Mbps Up Data | \$69.99 per month |
| ▪ 100 Mbps Down / 10 Mbps Up Data | \$79.99 per month |
| ▪ 200 Mbps Down / 20 Mbps Up Data | \$94.99 per month |
| ▪ 400 Mbps Down / 80 Mbps Up Data | \$124.99 per month |

Much faster speeds for the unique needs of businesses will be immediately available at competitive rates.

Amherst offers optional unlimited voice and digital television services at the start, to all new customers.

Amherst Telephone Company, having the expertise to carry out this project and the necessary matching contribution, along with the Towns of Rose/Springwater are seeking the additional funding necessary through

the Wisconsin Broadband Expansion Grant Program to successfully construct a reliable infrastructure for the portions of the Towns of Rose/Springwater/Belmont and Dayton.

Mandatory Application Requirements

3.2.1 Applicant identification and contact information

- a. The name of the entity applying for the grant, and the mailing address, telephone number and e-mail address of one or more contact persons representing the applicant.

Name of Entity: Amherst Telephone Company
Mailing Address: 120 Mill Street, PO Box 279, Amherst, WI 54406
Telephone Number: 715-824-5529
Contact: Richard Letto, Executive Vice President and General Manager

- b. If the application proposes a public-private partnership, the identity and contact information for all application partners.

This application proposes a public-private partnership between the Towns of Rose and Springwater, and Amherst Telephone Company.

Public Partner name: Town of Rose
Represented by: Duane Apps, Town Chairperson
Business address: 545 Front. St., Wild Rose, WI 54984
Phone: 715-366-8341
Public Partner name: Town of Springwater
Represented by: Everett Eckstein, Town Chairperson
Business Address: W 7033 Cty GH, Wild Rose, WI 54984
Phone: 920-622-3972

Amherst Telephone Company is represented by Richard Letto, its EVP and General Manager.

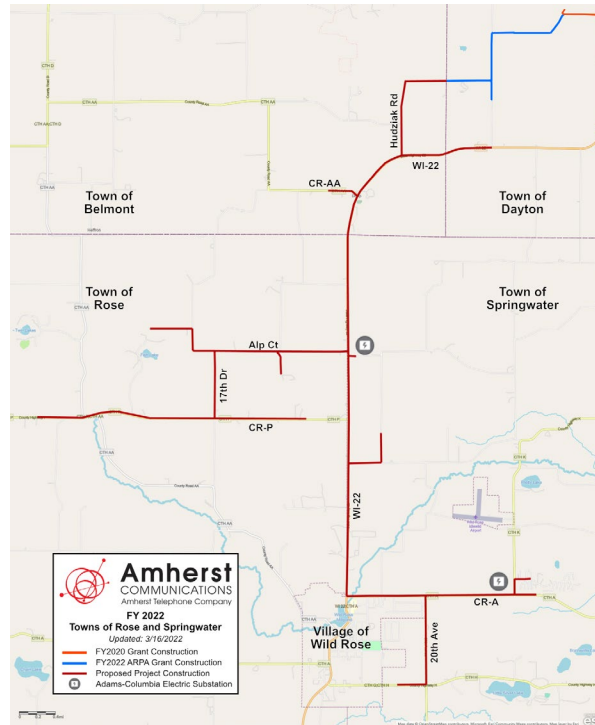
- c. The application must show that the applicant is an organization, a telecommunications utility, or a city, village, town, or county that has established a legal partnership or joint venture arrangement with an otherwise qualified organization or telecommunications utility, and as such meets the eligibility requirements set forth in Wis. Stat. § 196.504(1).

Amherst Telephone Company is an Incumbent Local Exchange Carrier certified to provide telecommunications service in the State of Wisconsin pursuant to Section 196.50(2)(b) of the Wisconsin State Statute.

Amherst Telephone Company (PSCW Utility # 170) provides incumbent ILEC services in the Amherst, Rosholt and Polonia exchanges (Study Area Code 330843).

3.2.2 Description of the project

- a. A static map and description of the area of the state that will be affected by the proposed project.



Amherst Telephone Company and the Towns of Rose and Springwater propose to provide a fiber-to-the-home (FTTH) network that will reach 220 homes in the Towns of Rose and Springwater along the STH 22 Town Line in Waushara County.

This area of central Wisconsin is in need of reliable broadband services. Accordingly, local residents and businesses who have shared their concerns for service. Many stating that current wired service is inadequate and wireless options have been unreliable for current broadband needs of streaming for work and school. Residents told us of the need for fiber-based internet to improve their quality of life. This project does so for the residents and businesses along the 18.5 road miles.

In addition, this Fiber Project will allow for Adams-Columbia Electric Cooperative to connect two of their substations to improve their Smart Grid activities; Substation Supervisory Control and Data Acquisition (SCADA).

Amherst Telephone Company will construct fiber optic cable from placement of additional and current Cabinets that are providing FTTH Services neighboring this area. These cabinets are equipped with Calix Fiber Line Cards having the ability to add additional line cards as the services continue to grow within the area. In addition, the cabinets are adequately powered and equipped with the appropriate back up power to maintain service in the event of an outage.

These cabinets are part of Amherst Telephone's redundant backbone ring and is monitored by our Network Operations System 24x7.

The FTTH network that will be constructed will be able to provide Gigabit internet service and faster as demand for these services grows. As customer demand and market conditions dictate the need for higher internet speeds, the network will supply them, and has the capability to increase them well into the future.

Amherst's network has a robust design involving varying fiber cable counts ranging from 12 strands to 144 strands as determined by the current residential and business densities. Being a rural

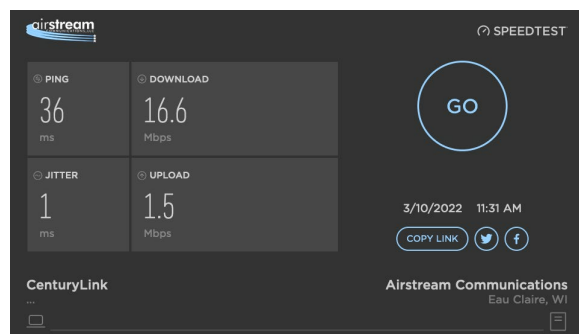
deployment and with our experience for the past 14 years in rural FTTH deployment, we find this transport facilities configuration to adequately serve the proposed area and enables future expansion.

Service drops and the electronics necessary to provide the FTTH services will be supplied to residential and business locations as requested. Our current construction process allows for mainline fiber to be constructed during the prime season of April through November. Fiber drops buried to the homes prior to winter freeze up will be provide for installation throughout the winter months. This allows for the maximum construction and installation process to bring subscribers on-line throughout the entire year.

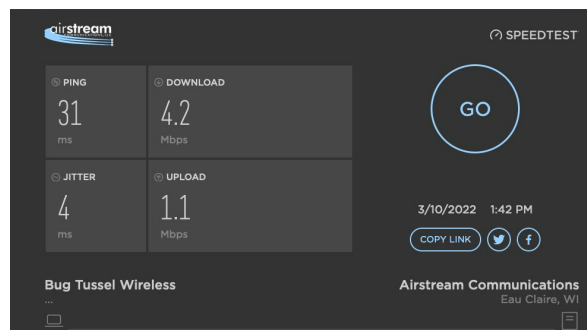
- b. If the project area lies within a census block designated as served on the PSC Broadband Map, provide additional documentation to demonstrate the actual broadband service that is available in the proposed project area.

The area this Fiber Project proposes appears as “served” according to the PSC Broadband Map. However, area residents and business owners that we have been in contact with widelyexpressed unreliable, slow or inconsistent services. Here are just a couple examples.

A speed test conducted by one resident, Grant McKendry, a Century Link customer, purchased 30 Mbps download but only achieves a 16.6 download speed based upon the latest speed test. His comment is Exhibit C – Letters of Support.



The speed test conducted by Sorenson’s Tax & Accounting located within the proposed Fiber area showing they are unable to get adequate service. She has Bug Tussel fixed wireless service and can only get 4.2 Mbps from her location as noted in the speed below. Her full comments can be read in Exhibit C – Letters of Support.



Many others have stated similar situations along this route and have expressed their concerns within Exhibit C – Letters of Support to help us believe that the probability of insufficient broadband is prevalent within this area. The Fiber Optic network we propose will eliminate these inconsistencies.

A a geodatabase file has been provided to the State Broadband Office. It contains the area and census blocks that comprise this project.

- c. An explanation of how the proposed project will increase broadband access.

The proposed project will increase broadband access in the northcentral portion of Waushara County a Wild Rose exchange which Century Link serves as the incumbent. Utilization of service will improve due to a Fiber Network which does not have limitation copper fixed wireline. Allowing for more people to access the internet on a consistent basis.

Fixed wireless broadband services are said to be available at 25/3 and 60/8 in Rose and Springwater. This project will provide a facilities based fiber optic technology solution that will remain superior to wireless and copper-based plant currently serving within this area. Our proposed fiber-based broadband will remain functional for decades longer than current wireless options.

- Potential and expected number of households served, including number of unserved and underserved locations

The Fiber Broadband service will provide Gigabit internet speeds and faster as demand customer demand them. There are currently 220 residential and businesses that are impacted through this Broadband expansion.

Fiber-based broadband will drive significant employment and income growth in the Towns of Rose and Springwater. These areas have opportunities for development next to main highways and our proposed mainline fiber. Fiber broadband will raise the selling price of residential and business real estate in the area. People in areas like these regularly ask Amherst when and where we will deploy fiber broadband, before they make a decision to purchase land to build a house.

- Potential and expected number of businesses served, including number of unserved and underserved locations

There are 12 business locations within this project areas. There are varying types of businesses within this project area from small tax accounting firms, dairy, Manufactured Housing Community & Campground to large utility substations providing much needed power. Adams-Columbia Electric Cooperative will greatly enhance their Smart Grid activities by the successful implementation of this Fiber Network.

- Expected number of seasonal residents and tourists served

Pineland Park is a year round and seasonal recreational area. The current broadband services are inadequate for their year round residents and seasonal residents. There are 63 homes consisting of 39 year round and 24 seasonal homes along with 76 seasonal campsites that would be able to access this network. The incumbent carrier has notified Pineland Park that internet is not available to any new customers. The improved broadband service would allow for the seasonal residents and guests to stay longer due to having a more robust broadband opportunity.

- Estimated download and upload speed of the broadband service packages available for purchase. Amherst Telephone Company plans to offer affordable residential broadband services at our current bundled rates:

▪ 50 Mbps Down / 5 Mbps Up Data	\$69.99 per month
▪ 100 Mbps Down / 10 Mbps Up Data	\$79.99 per month
▪ 200 Mbps Down / 20 Mbps Up Data	\$94.99 per month
▪ 400 Mbps Down / 80 Mbps Up Data	\$124.99 per month

Much faster speeds for the unique needs of businesses will be immediately available at competitive rates.

- d. A statement whether the proposed project is targeting the “last mile,” “middle mile,” or backbone portion of the broadband infrastructure.

The proposed project includes backbone and last mile fiber facilities.

No middle mile infrastructure or its costs are included or necessary to meet deployment objectives of this grant application.

Amherst Telephone Company currently maintains sufficient middle mile and backhaul facilities and capacity on its existing backbone ring network to deliver all proposed and future last mile subscribers in the area, and subject to all current state and federal regulations.

An enhancement as part of this network expansion would be route diversity with Union Telephone Company to the east of the proposed project. The ability to provide route diversity will help improve the current network redundancy. This would be a key benefit to all residential and business customers but definitely for the addition of Adam-Columbia Electric’s substations.

- e. A description of the broadband service to be provided, including estimated download and upload speeds, whether the speed is based on dedicated or shared bandwidth, and the technology that will be used. This description may be illustrated by a map or schematic diagram, as appropriate.

Amherst Telephone Company will provide its broadband service exclusively using a FTTH network. This fiber network is a like-engineered extension of the company’s existing FTTH fiber network, currently in place and used in Amherst’s regulated service territory. The same technologies will be used to provide the highest quality of service to all new customers served as a result of this application.

All broadband electronics used to provide broadband services will be managed to the same standards as those in Amherst’s regulated service territory.

Amherst Telephone Company plans to offer broadband services at these prices to residential subscribers in the area:

▪ 50 Mbps Down / 5 Mbps Up Data	\$69.99 per month
▪ 100 Mbps Down / 10 Mbps Up Data	\$79.99 per month
▪ 200 Mbps Down / 20 Mbps Up Data	\$94.99 per month
▪ 400 Mbps Down / 80 Mbps Up Data	\$124.99 per month

Much faster speeds for the unique needs of businesses are available at competitive rates. Amherst also offers optional voice and digital television services to all new customers.

- f. For middle mile projects N/A. This is not a middle-mile project.
- g. A schedule by which the applicant intends to complete the components of the proposed project. The project period is up to 24 months.

If the grant application for the project is approved by late May of 2022, Amherst Telephone Company will use the following deployment schedule, based on similar projects it has completed:

• June-July 2022	Finalize Engineering
• August-September 2022	Verify current inventory levels and order materials as needed
• October-November 2022	Bury new backbone and distribution fiber
• April-June 2023	Resume backbone and distribution fiber
• July-November 2023	Begin burying fiber drops
• August 2023	Begin installation of electronics and start installation of services

3.2.3 Itemized Budget (all amounts should be rounded to the nearest dollar)

- a. In addition to the Summary of Project Budget that is included as page 3, applicants should include a price list or quote for any equipment the applicant intends to purchase, including capital expenditures. The application should also indicate whether any facilities involved would be owned, rented, or leased.

Exhibit B – Construction Costs – summarizes construction costs for the fiber network.

Exhibit B – Construction Costs provides a summary of the construction costs for fiber network. Engineering, some construction and some installation will be performed by Amherst Telephone Company employees and long-term third-party contractors under contract and under supervisory control of Amherst Telephone Company.

All network will be owned and managed by Amherst Telephone Company.

- b. The application must show that the grant, if awarded, will not subsidize the expenses of a telecommunications provider or the monthly bills of telecommunications customers. For purposes of this grant program, subsidy means a contribution to the operating costs, including profit, of the telecommunications provider.

The grant funds requested in this Application will only be used for authorized purposes.

The applicant will not subsidize its ongoing expenses or the monthly bills of telecommunications customers. It is understood that for purposes of this grant program, subsidy means a contribution to the recurring service charges, operating costs, including profit, of the telecommunications provider.

- c. The application must show that the grant funds requested will be used for the sole purpose of constructing broadband infrastructure in the underserved areas covered by the application. Construction of broadband infrastructure may include any of the following:
- Project planning that takes place during the performance period
 - Obtaining construction permits
 - Construction of facilities, including construction of both “middle mile” and “last mile” infrastructure.
 - Installation and testing of the broadband service

All grant funds requested in this Application will be used for the sole purpose of constructing broadband infrastructure in the unserved/underserved areas described in this Application. Amherst will self-fund its contribution to this project’s construction costs.

See **Exhibit B** for a summary of construction costs.

3.2.4 Priority factors supporting the application

- a. **Matching funds.** A description of the matching funds the applicant will invest in the proposed project, if any. For each element, indicate the type of match (cash, salary expense, or in-kind contribution). If the application is submitted by a partnership, identify the partner responsible for providing each element of the proposed matching funds. Note: The requirement for this information is satisfied via inclusion of the completed Funding Statement as page 4 of the application.
- If available, provide documentation to support an offer of matching funds (minutes of a town board meeting, a letter from a prospective customer or local government official, etc.).
 - Matching funds contributions must be a firm commitment of funding to the project. Contributions that vary based on the amount of actual sales, customer contributions, or other criteria will not be given weight

Matching contributions will be at least 65% of total construction costs of \$969,821. Amherst Telephone Company will contribute \$358,834 in the form of construction costs and directly attributable salary costs.

In addition, Adams-Columbia Electric Cooperative has entered into a Contribution of Funds Agreement with Amherst Telephone Company and will contribute \$271,550 that is included in the 65% matching funds. The Contribution of Funds Agreement can be view in Exhibit E – Supplement.

Matching funds are accounted for on page 4 of this application.

- b. **Public-private partnerships.** A description of any public-private partnership involved in the project. If the partnership has not been reduced to a written agreement, provide a short description of the management role, financial commitment, or other contribution to the project for each participating partner.
- In scoring this element, information regarding active engagement of diverse communities in the planning, permitting, or marketing of the project will be given weight as well.

This application includes a public-private partnership between the Town of Rose, Town of Springwater and Amherst Telephone Company. The Towns have and continue to be a constructive voice with neighboring towns. The Town of Rose and Springwater continues to:

- Provide in-kind assistance to the Project which may be in the form of waived fees and expenses for obtaining permits or permissions required from local government;
- Grant permission on and across Town property to engage in activities to construct the Project in compliance with all existing rules and regulations;
- Provide administrative support and resources as may be agreed upon, in support of the Project;
- Provide community education and outreach regarding the expansion of broadband access to residences and businesses within the scope of the Project

- c. **Existing broadband service.** A list of the broadband service providers, if any, currently serving the area the applicant proposes to serve. In scoring this element, the following factors will be taken into account:

- The degree to which the proposed project avoids duplicating existing broadband infrastructure.

The proposed project does not duplicate existing broadband infrastructure at the PSC's defined 25/3 Mbps speed.

- The application of a wireless broadband service provider proposing significant overlap with existing broadband service in addition to service to an unserved area will not be given priority consideration.
- Provide a list of all landline broadband service providers (DSL, cable or fiber to the home) and fixed wireless broadband service providers that overlap the footprint of the proposed broadband project.

Century Link is the only landline service provider in the proposed grant area. In the Towns of Rose and Springwater, they advertise a combination of DSL offerings from 3/1 to 60/5 depending upon subscriber distance to copper vdsl cabinets. The actual service by location varies with distance from cabinet and the quality of copper cable. Many area subscribers tell us they do not receive advertised speeds.

The quality of the copper cable has a lot to do with the actual speeds customers would obtain. Unlike the Fiber Network that the grant proposes which would be consistent no matter the distance, or age.

In the Town of Rose and Springwater, Bug Tussel, Waupaca On-line and T-Moblie advertise Fixed Wireless internet services at speeds not exceeding 10/1 Mbps to 60/8. These speeds are limited by environmental factors. Stated rates with fixed wireless is dependent on line of site, capacity of antanea and other variables. Unlike the Fiber Network that that grant proposes which would be consistent and less susceptible to environmental factors. Residents report not receiving the advertised speeds.

- If known, provide an estimate of the customers within the proposed footprint that are served by competing landline and fixed wireless broadband service providers, and the download/upload speeds offered by those competing service providers.

We are unable to estimate the percentage of customers within the proposed footprint that are served at these advertised download/upload speeds, in part because so many of them have either said that's not the case, or have sent us letters—some of which appear in Exhibit C, below.

- Provide a list of mobile wireless broadband service providers that overlap the footprint of the proposed project.

CMRS mobile wireless broadband service providers include AT&T, Cellcom, US Cellular and Verizon Wireless— advertising the availability of 4G/LTE services in the area.

- If known, provide an estimate of the customers within the proposed footprint that are served by competing mobile wireless broadband service providers, and the download/upload speeds offered by those competing service providers. (The presence of existing mobile wireless providers does not contribute to or affect the evaluation of existing broadband service in the project area for purposes of priority consideration, but provides a more complete picture of the broadband options available to residents.)

Cellular service is not always available due to many factors. Residents have told us that fast-broadband would allow home wi-fi connections to improve home cellular service, and more economical internet services than cell phones offer.

- For middle mile projects, describe the unserved and underserved areas that the middle mile route will transit. In scoring this element, the following factors will be taken into account:
 - The number of unserved and underserved service locations that could potentially connect through the proposed middle mile route.
 - The degree to which the middle mile route will reduce the cost of extending fiber to the premises broadband service to business and residential service locations in an unserved or underserved area.
 - The degree to which the proposed middle mile route avoids duplicating existing and planned fiber to the premises broadband infrastructure.

N/A. This is not a middle-mile project.

- d. **Project impact.** A description of the geographic area and the population, both in terms of absolute numbers and likely users, which will be served by the proposed project. Indicate the number of anticipated residential and business customers in the project area, if known. Explain the speed and quality of internet service that will be available. Include information about the range of packages available for purchase. Provide details on any low-income access programs and steps the project will take to support adoption

The Towns of Rose and Springwater are made up of several smaller communities including the rural areas proposed within this grant. The 220 current households/businesses are southwest of the City of Waupaca and North of Wild Rose. Residents know the area is not suburban, but truly rural, currently with very low population density and without recent telecommunications infrastructure investments to the area.

Rose and Springwater in Waushara County are in great need of reliable broadband services. Many of the residents who live in these two townships have their children or they themselves may attend the same schools (i.e. Elementary, High School, University or Technical College) with the same homework assignments needing the same broadband services to complete assigned work as students in the more populous parts Waushara County. The impact of high-speed internet for these students will allow them to complete their assignments at home without having to travel to use a Wi- Fi hotspot or the public library.

Likewise, at home workers will enjoy the benefits of choosing to live in these communities because of its robust FTTH network. Currently, many residents working at home lack the broadband services which inhibit their ability to compete for jobs. Many tell us they need the higher upload speeds for Zoom Meetings, as well as school at home and Telemedicine visits. This FTTH project will allow them to do and compete on an even playing field with their urban counterparts. Amherst offers a wide range of packages with speeds ranging from 50/5 Mbps to 400/80 Mbps, and will be adjusted based upon demand.

In addition, a low-income option is being worked on at the present time which will entail a Lifeline Option. This option will be provided to those residents who qualify for the program. The base speed of 50/5 Mbps will be offered to these recipients.

One last area that can be overlooked, but has a huge impact, is the need for broadband services for the dairy farmers in the area. More and more high-tech solutions are being developed for this industry and the lack of broadband services creates a competitive disadvantage.

Overall, the impact of this broadband expansion project will reach 220 locations within the Towns of Rose and Springwater. The greatest impact of High Speed broadband services is something that not only will benefit the individual quality of life but the community as a whole.

Primary benefits of this project include:

Delivering the area's only fiber-to-the-home (FTTH) network. Residents and businesses will benefit by a network that will provide up to a gigabit. The faster connectivity will give residents world class access to education, healthcare, Work at Home applications and video services, not available before. Businesses coming to these communities will now be on an equal footing with their urban counterparts, attracting capital and workers not now in the area. It is expected that new housing and jobs will be stimulated by the existence of fiber-based broadband services.

High speed broadband service will allow many residents to work at home as employers allow. This broadband project will provide the facility-based infrastructure to expand to new housing developments.

Vacant lots will now be prime locations with the new high-speed broadband. Realtors will have an enhanced selling attribute to the prospect buyer now that fiber optic broadband services are available. Employment and the local tax base increase as a result.

Access to emergency services. High-speed fiber-based broadband services enable rural practitioners in the Northern Health Centers to transmit medical imagery and data to clinics and healthcare providers in larger population centers. Along with access to broadband, this is cited as an important concern of visitors and seasonal residents—apart from the value it confers to permanent residents and small businesses in the area.

Home WIFI networks will expand the range of cellular phones, and provide connectivity in homes choosing not to use landline telephone services.

The personal impacts of this project can be seen in the letters of support recently received, and appearing in Exhibit C of this application.

- e. **Scalability.** A description of how the proposed project could expand or improve the broadband service it delivers, while maintaining the quality of its broadband service. This description should include specific projected increases in the following parameters that are known at the time of the application:
- The number of users.
 - The number of network nodes.
 - The number of services provided.
 - The geographic area served by the project.

The current application is an example of the scalable nature of Amherst's ability to expand its architecture and marketing reach into new, unserved/underserved rural areas adjacent to its own rural service areas.

Materials, methods, systems and network elements used in the present project are the same as those used within Amherst's regulated service area. This provides a significant cost savings that allows the

company opportunities for low cost expansion and service customer needs through the same approaches and personal care it has shown in service areas it has grown since 1903.

These same skills prove valuable as Amherst looks to the next expansion, beyond this project. Amherst's network design provides for scalable expansion.

Our proposed project in the Towns Rose and Springwater will attract new residents and businesses. They will relocate to areas having fiber broadband, as it expands the opportunity for in-home businesses to flourish with the use of the Internet. Brick and mortar businesses will be attracted to the area because the population base has the ability to grow through attracting new activity in the area. Family farms can become competitive with the use of technology. School, restaurants, shopping centers, and local economies can show signs of improvement when Fiber Broadband is brought to rural Wisconsin.

All of this expansion brought on by increased telecommunications bridges the digital divide to rural Wisconsin, allowing residents the option to choose rural and not give up the amenities of urban living.

Fiber Broadband that is proposed in the Town of Rose and Town of Springwater will open up a new era that will allow for the unlimited possibilities for future growth and expansion. It's a win for the Townships and a win for the state of Wisconsin.

For middle mile projects, describe the spare or unused fiber capacity in the route and any future projects planned to use that capacity in the future. For purposes of the question, planning can mean either specific uses already the subject of contract or serious negotiation, or tentative uses that may or may not actually be contracted for in the future.

N/A. This is not a middle-mile project.

- f. **Economic Development.** A description of how the proposed project will promote job growth or retention, expand the property tax base or improve the overall economic vitality of the municipality or region. This description may be supplemented with a letter from one or more persons discussing the potential economic impact the project could have for that individual or business. In scoring this element, the following factors will be taken into account:
- A discussion of potential economic impact the project could have for an individual business located in the project area.
 - An explanation of how an improved download and upload transmission speed could better support a specific business in the project area.
 - An explanation of the likely impact improved broadband service could have on residential property values, supported by local sales data if available.
 - A demonstration of how improved broadband service to a residential portion of the project could benefit a telecommuting population.
 - A demonstration of how the speeds and service being offered by the project fits with current and future economic needs of the community and local businesses.

Many of the letters of support appearing in Exhibit C of this application directly address the reliability and quality of speed of service to conduct work at home or student homework at home. This rural area lacks broadband amenities available in neighboring cities.

People in this area who do need reliable high speed internet to work from home, complete schoolwork, run their business better, stay involved in community activities, and engage in all manner of correspondence and commerce have contacted providers and others in hopes of gaining access to unlimited service delivering the speed and reliability that they need. These needs have been ignored.

A grant in the Rose/Springwater area would advance employment and income by simply raising the quality of instruction in their local schools. This Broadband project is an important step toward closing this gap.

- g. **Effect upon broadband service to adjacent areas.** A description of whether the proposed project will or will not impair the ability of a broadband service provider or competing broadband service provider to extend broadband service to areas adjacent to the proposed project area.

The proposed project area is at the northcentral portions of Century Link's Wild Rose exchange. Services to these areas, according to residents, lack adequate reliable broadband. The result is that, in fact, fiber expansion into this area will not impact the incumbent's ability to serve areas adjacent to the proposed project areas

3.2.5 Other information supporting the application

- a. A description of applicant's history or experience constructing broadband communications facilities in the state and elsewhere.
- If applicable, an applicant must comment upon the status of all prior broadband expansion grant projects, including the type of broadband technology used, the facility route actually built or installed, the number of residential and business customers actually connected, and other relevant details of the prior project(s).
 - An applicant must also comment on broadband construction projects undertaken in prior years that were not funded in part by the Broadband Expansion Grant program.

The Amherst Telephone Company has been in business providing telecommunications since 1903. A progressive and future driven company, Amherst Telephone Company has gone through many changes in technology over the years and has continued to thrive with each new advancement in technology.

Amherst Telephone Company has been providing internet services since 1995, IPTV (digital TV) since 2007, and successfully deploying Fiber Optic networks with a dedicated team of technicians and customer service oriented employees.

In 2008 Amherst Telephone company saw the need to improve broadband services to its customers. That was the beginning of a strategic planning and implementation process to prudently and progressively construct a fiber optic cable network within the ILEC study area. Over that period of time we have completed 95% of our ILEC area with a plan to complete this process in 2022 to achieve a 100% fiber network.

While we continue to expand our fiber optic network within our ILEC area we have sought out opportunities to expand into adjacent areas. This growth has been initiated by the advancement of fiber needs to cell towers and rural broadband needs. Seeing both as opportunities, Amherst Telephone Company continues to survey underserved and un-served neighboring areas listening to the needs of those residents and businesses and providing them with high speed broadband services.

The success of our business relies upon foresight, flexibility, and execution of a business plan. Amherst Telephone Company has shown for the past 100+ years it has and will be up to the challenge.

- b. A description of how the proposed project will or will not duplicate existing broadband infrastructure

This application does not duplicate existing broadband infrastructure.

The area proposed in this application does not currently have a fiber communications infrastructure, and is not unlikely to the coming years. There is fixed wireless internet infrastructure advertising up to 60/8Mbps speeds, however, there is no comparison of the service quality of fiber versus aging copper plant, or distant fixed wireless equipment that would count as

a duplication of infrastructure.

- c. A description of an applicant's financial ability to undertake the proposed broadband construction project. This may include information such as the number of years the company has been in operation, documentation of successful completion of similar infrastructure projects, evidence that sufficient funds are available to cover project expenditure and match, customer turn-over rates, and credit rating.

Amherst Telephone Company continues to be a financially sound company as is evident with the continued fiber optic cable expansion in both their ILEC territory and CLEC expansion areas. Amherst has successfully completed broadband expansion to rural areas through five Broadband Expansion Grants with plans to complete its sixth Broadband Grant expansion area in the fall of 2022. Amherst, a company with a strong financial and operational history looks to continue expanding broadband to rural Central Wisconsin by working with local communities who see the value of working with a reliable partner.

- d. For middle mile projects, state the terms under which the applicant will make its middle mile fiber resource available to last mile providers. Without disclosing project-specific or customer-specific negotiated rates for service or access, state whether access to the middle mile fiber resource will be offered to last mile providers at a rate that is reasonable and common to the industry. Describe any restrictions or limits that may limit the availability or interconnection with the middle mile route.

N/A. This is not a middle-mile project.

- e. For middle mile routes, state the amount of fiber capacity, by number of fiber strands in a cable, that the applicant has been reserved for public use. Describe any commitment or tentative discussion indicating the local government or State agency that might use those fiber strands, and for what purpose. Describe any restrictions or limits that may limit the public use (e.g. a possible use conflicts with an existing program covering the same subject matter).

N/A. This is not a middle-mile project.

- f. A description of how the proposed project will affect the ability of individuals to access health care service from home, including any impact upon the costs of those services.

- Specific information from a hospital or clinic in the project area that currently uses or intends to use home-based telemedicine equipment to enhance access health care service would best illustrate this point

In any sparsely populated area, the introduction of fiber infrastructure enables much faster and more reliable access to healthcare services and providers. Remote diagnostic medicine and health maintenance services from pediatric to geriatric purposes become possible with simple laptop cameras and attached devices that are becoming commonly available. The costs of travel and ultimately health insurance can quickly decline just due to the availability of high-speed broadband services.

Telemedicine provides rural residents in Central Wisconsin with basic monitoring and testing from the privacy of their homes, when supported by High-Speed Fiber Broadband as proposed within this application. Specifically, in the winter months where driving miles on winter roads can be hazardous, telemedicine from home will help keep the elderly safe and at home while maintaining their health and improving their quality of life.

- g. A description of how the proposed project will affect the ability of students to access educational opportunities from home.
- Specific information on the likely number of students that will benefit from improved access to educational opportunities from home would be useful.
 - Specific information regarding educational programs currently available for students in the project area would be useful

High speed broadband access for the purposes of research and completing homework *at home*

become possibilities if this application is accepted. As schools depend more and more on interactive distance learning and Internet access in real-time, especially in these times of COVID, the availability of high-speed broadband to students and those seeking vocational training will now be unencumbered by connection speed.

We currently work with various School Districts in providing Broadband services for low income students. These programs have been tailored to each School District's needs with the best outcome of providing students the ability to access their classrooms with quality broadband services.

Additionally, providing this connectivity during 2022 significantly improves the return of this grant as an investment in Wisconsin's workforce and educational system.

- h. A description of actions taken by a city, village, town, or county in support of the grant application, including but not limited to:

- The contribution of funds, easements or permissions to use publically-owned real estate, construction materials, or other items of value to the grant project.
- The contribution of in-kind assistance to the grant project in the form of waived fees and expenses for obtaining use permits and permissions.
- The contribution of other items of benefit to the grant project, such as public outreach and education, vehicles, water, etc.
- Certification as a Broadband Forward! Community or Telecommuter Forward! Community

The Public Private Partnerships appearing in full in **Exhibit A** of this application describe the range of in-kind support the Towns of Rose and Springwater are offering, as a spur to rapid and successful completion of this project.

The Towns of Rose and Springwater are committed to the success of this partnership. Both Town Clerks will supply mailing addresses for our local broadband surveys and communications. This is critical to the success of any survey or communications, accurate mailing information has provided with a very high level of returned surveys.

These examples may not be in the form of dollars and cents, but in the building of commitment and motivation to educate; both Townships and Amherst are working toward a common goal for the community; a shared purpose of improving broadband infrastructure to the area.

- i. Letters and messages in support of the application submitted by prospective customers, local government officials, and other interested persons.

Amherst has received many letters of support from state and local government officials, residents who would like to work at home, and those running businesses at home. These letters and messages of support are listed in Exhibit C with key aspects on how this Broadband Grant will enhance the quality of life in the Towns of Rose and Springwater.

- j. Any other equitable factor that the applicant desires to discuss, including one or more of the factors in Wis. Stat. § 196.03(6) that the applicant believes its project would advance. In discussing this element, the following information may be useful:

- Technical support and training materials that the applicant intends to provide.
- Information that the applicant intends to use to promote better broadband adoption and use.
- A description of a program or outreach to provide assistance to individuals of low income.

This application has at its disposal the full engineering, operations and systems strength of Amherst Telephone Company. That includes access to equipment and labor markets, consultants and capital markets.

This application also benefits from the availability of Town Board members, who work regularly with Amherst to develop better broadband infrastructure plans that target the needs and priorities of county residents and employers.

Exhibits

Exhibit A – Public-Private Partnership Agreements

Exhibit B – Construction Costs

Exhibit separately submitted, concurrently with this application

Exhibit C – Supplement: Contribution Agreement and Full Letters in Support of this Application

Exhibit A – Public Private Partnerships

Public-Private Partnership Agreement

Attachment A

Page 1 of 2

Public-Private Partnership Agreement

By and between The Town of Rose, WI and

Amherst Telephone Company (Amherst)

THIS AGREEMENT (the "Agreement") is made this 14th day of March, 2022 by and among the Participating Parties (defined below) located in the State of Wisconsin (the "State") which, through their duly authorized representatives, have signed this Agreement.

WHEREAS, the Town of Rose, WI, wishes to help provide access to resources and the support structure necessary for economic development in Waushara County; and

WHEREAS, Amherst Telephone Company, a Wisconsin corporation, proposes to expand broadband capability to reach the most potential un-served or under-served residences and businesses in Waushara County where such service is currently unavailable or is prohibitively expensive and specifically herein (the "Project"); and

WHEREAS, it is currently expected that the proposed broadband expansion would be constructed in the Town of Rose and surrounding areas in Waushara County, Wisconsin (each unit of local government a prospective "Participating Party" and collectively, the "Participating Parties"); and

WHEREAS, to further support its application for a Broadband Expansion Grant, Amherst has requested that the Town of Rose enter into an Agreement, referred to as a Public Private Partnership Agreement, to assist in this Project by:

- providing in-kind assistance to the Project which may be in the form of waived fees and expenses for obtaining permits or permissions required from local government;
- granting permission on and across Town property to engage in activities to construct the Project in compliance with all existing rules and regulations;
- providing administrative support and resources as may be agreed upon, in support of the Project;
- providing community education and outreach regarding the expansion of broadband access to residences and businesses within the scope of the Project; and,
- recognizing that the Broadband Expansion Project is a priority and is consistent with any internal planning documents adopted by the Town's governing committees.

NOW, THEREFORE, it is hereby agreed by and among the Participating Parties as follows:

1. **Records.** The Town of Rose will maintain and be the custodian of all records associated with the administering and performance of this Agreement and will make those records available to all Participating Parties upon request.
2. **Reporting.** Amherst shall meet with The Town of Rose representatives on a semi-annual basis for the purpose of presenting an oral report on the status of the Project. The date, time and place of such meeting shall be determined cooperatively among the parties. No less than seven (7) days prior to such meeting, Amherst shall provide to the Town a written report regarding siting, construction progress with respect to the Project.
3. **Effective Date.** This Agreement shall become effective upon its adoption by all Participating Parties. Any initial Participating Party, or additional Party entering into this Agreement shall adopt within 90 days an authorizing resolution and provide a certified copy of the resolution to all other Participating Parties. This Agreement shall remain in full force and effect until terminated as provided herein.
4. **New Members.** After the effective date of this Agreement, additional municipalities may join in this Agreement.
5. **Termination.** This Agreement shall be deemed terminated by any party upon thirty (30) days written notice requesting termination of this agreement in whole or in part.
6. **Severability.** The terms of this Agreement are severable and any determination by any court or agency having jurisdiction over the subject matter of this Agreement that results in the invalidity of any part shall not affect the remainder of the Agreement.
7. **Amendments.** The terms of this Agreement shall not be amended without the written authorization of the governing bodies of all Participating Parties.
8. **Governing Law.** This Agreement shall be governed by the laws of the State of Wisconsin.
9. **Counterparts.** This Agreement may be executed in two or more counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same instrument.

The Town of Rose, Wisconsin, a Participating Party

Duane Apps

Name & Title: Duane Apps, Chairman

Date: 3/14/02

Acknowledged:

AMHERST TELEPHONE COMPANY

Richard Letto

Name & Title: Richard Letto - EVP/6M

Date: 3/14/2022

Public-Private Partnership Agreement

By and between The Town of Springwater, WI and
Amherst Telephone Company (Amherst)

THIS AGREEMENT (the "Agreement") is made this 14th day of March, 2022 by and among the Participating Parties (defined below) located in the State of Wisconsin (the "State") which, through their duly authorized representatives, have signed this Agreement.

WHEREAS, the Town of Springwater, WI, wishes to help provide access to resources and the support structure necessary for economic development in Waushara County; and

WHEREAS, Amherst Telephone Company, a Wisconsin corporation, proposes to expand broadband capability to reach the most potential un-served or under-served residences and businesses in Waushara County where such service is currently unavailable or is prohibitively expensive and specifically herein (the "Project"); and

WHEREAS, it is currently expected that the proposed broadband expansion would be constructed in the Town of Springwater and surrounding areas in Waushara County, Wisconsin (each unit of local government a prospective "Participating Party" and collectively, the "Participating Parties"); and

WHEREAS, to further support its application for a Broadband Expansion Grant, Amherst has requested that the Town of Springwater enter into an Agreement, referred to as a Public Private Partnership Agreement, to assist in this Project by:

- providing in-kind assistance to the Project which may be in the form of waived fees and expenses for obtaining permits or permissions required from local government;
- granting permission on and across Town property to engage in activities to construct the Project in compliance with all existing rules and regulations;
- providing administrative support and resources as may be agreed upon, in support of the Project;
- providing community education and outreach regarding the expansion of broadband access to residences and businesses within the scope of the Project; and,
- recognizing that the Broadband Expansion Project is a priority and is consistent with any internal planning documents adopted by the Town's governing committees.

NOW, THEREFORE, it is hereby agreed by and among the Participating Parties as follows:

1. **Records.** The Town of Springwater will maintain and be the custodian of all records associated with the administering and performance of this Agreement and will make those records available to all Participating Parties upon request.
2. **Reporting.** Amherst shall meet with The Town of Springwater representatives on a semi-annual basis for the purpose of presenting an oral report on the status of the Project. The date, time and place of such meeting shall be determined cooperatively among the parties. No less than seven (7) days prior to such meeting, Amherst shall provide to the Town a written report regarding siting, construction progress with respect to the Project.
3. **Effective Date.** This Agreement shall become effective upon its adoption by all Participating Parties. Any initial Participating Party, or additional Party entering into this Agreement shall adopt within 90 days an authorizing resolution and provide a certified copy of the resolution to all other Participating Parties. This Agreement shall remain in full force and effect until terminated as provided herein.
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8. **Governing Law.** This Agreement shall be governed by the laws of the State of Wisconsin.
9. **Counterparts.** This Agreement may be executed in two or more counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same instrument.

The Town of Springwater, Wisconsin, a Participating Party

Name & Title: Ernest E. Ebert

Date: 3-14-2022

Acknowledged:

AMHERST TELEPHONE COMPANY

Name & Title: Richard Lett - EVP/GM

Date: 3/14/2022

Exhibit B - Project Construction Costs**Amherst Telephone Company****Exhibit B - Construction Costs - FY2022 Towns of Wild Rose and Springwater**

<u>Units</u>	<u>Total Footage</u>	<u>Total Cost per Ft</u>	<u>Fiber Cost</u>	<u>Construction Cost</u>	<u>Total Cost</u>
BFO MST	27,889	\$5.08	22,590.09	119,179.26	\$141,769
BFO 12 I	913	\$4.98	1,013.43	3,535.65	\$4,549
BFO 24 I	10,766	\$5.16	13,457.50	42,139.67	\$55,597
BFO 36 I	1,765	\$9.25	2,400.40	13,923.96	\$16,324
BFO 48 I	11,112	\$5.41	15,667.92	44,480.90	\$60,149
BFO 96 I	25,307	\$5.66	45,299.53	98,002.87	\$143,302
BFO 144 I	52,794	\$6.46	116,674.74	224,417.64	\$341,092
					\$762,784
Engineering & Inspection 11%					\$83,906
Splicing 11%					\$83,906
Permits & Environmental					\$18,383
Cabinets					\$20,843
Total Project Cost					\$969,822

Notes:

All additional drop costs, customer electronics, and installation costs to provide FTTH to the customer premise will be funded by Amherst Telephone Company outside of this grant application.

Amherst Telephone Company**Exhibit B - Construction Unit Calculations - FY2022 Towns of Wild Rose and Springwater****Fiber Unit Breakdown of Rose and Springwater Updated 3/15/2022**

Segment	Description of Area	<u>BFO MST</u>	<u>BFO 12 I</u>	<u>BFO 24 I</u>	<u>BFO 36 I</u>	<u>BFO 48 I</u>	<u>BFO 96 I</u>	<u>BFO 144 I</u>
1	Hudziak from Tower West and South	2503						7723
2	STH 22 East of Hudziak to West Road	1132				3175		
3	STH 22 Waupaca Co to Washara Co Lines	4042						9632
4	County AA	76						
5	STH22 Portage County Line South to Akron Drive							3125
6	STH22 Akron Drive to Alp Court	1226						4525
7	Alp Court and STH 22 to ACEC Substation	761						
8	Alp to 17th to Cty P to Boundary and Cty P East of 17th	5213	913	4181			25307	
9	Alp Ct 17th Dr N to Alp L West From 17th Dr South	1272		4553				
10	STH22 Alp Court to CTH P							3886
11	STH22 CTH P to Aniwa Drive							3140
12	Aniwa Drive	1207		2032				
13	19th Drive	2242						
14	STH22 Aniwa Drive to Apollo Ave	1401						2831
15	STH22 Apollo Drive to CTH A	812						5955
16	CTH A from STH 22 East to ACEC Substation	2942						10969
17	CTH K North of CTH A to N5809	436						1008
18	Pineland Court to Campground Lodge	784			1765			
19	20th Ave and CTH GH to Tower	1840				7937		
		27,889	913	10,766	1,765	11,112	25,307	52,794